

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SADE COKER,**

Plaintiff,

v.

**GOLDBERG & ASSOCIATES P.C., and  
JULIE GOLDBERG, ESQ., an individual,**

Defendants.

Case No. 21-cv-01803 (ER)

**PLAINTIFF'S NOTICE OF MOTION FOR SANCTIONS AGAINST DEFENDANTS  
PURSUANT TO FED. R. CIV. P. 11(c)**

Comes now the Plaintiff in the above-captioned matter and moves this Court to sanction Defendants and their counsel pursuant to Fed. R. Civ. P. Rule 11 and such other and further relief as this Court may deem just and proper. Submitted contemporaneously herewith is a Memorandum of Law. The Motion is based on the fact that the Defendants' Motion to Dismiss [Dkt. 20] is not warranted by existing law, presents frivolous arguments, and was filed in order to delay proceedings and/or for other improper purposes.

Respectfully submitted, this \_\_\_\_ day of **August, 2021.**

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